
**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

V

CHRISTINA PATAKY-BEGHIN, et al

CRIMINAL NO.: 3:23-CR-00026-MEM

MOTION FOR CONTINUANCE

TO THE HONORABLE MALACHY E. MANNION,

Petitioner David S. Glanzberg, Esquire, respectfully requests Your Honor to grant this Motion for Continuance the above captioned matter.

1) Defendant Pataky-Beghin and her family require additional time to make the trip to Pennsylvania;

2) AUSA Michele Olshefski does not object to this Motion for Continuance;

3) Petitioner, David S. Glanzberg, Esq, respectfully submits the following dates for the Courts' consideration: January 16th, 17th or 18th 2023 at 1:30pm.

WHEREFORE, Petitioner humbly requests for this matter to be continued to allow Defendant Pataky and her family to make the trip from the West Coast to Pennsylvania.

Respectfully Submitted,

/s/ DAVID GLANZBERG
DAVID S. GLANZBERG, ESQ
CJA Appointed Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on December 21st, 2023, I filed the foregoing “Motion for Continuance” on behalf of Christina Patacky-Beghin with the United States District Court, Middle District of Pennsylvania.

By:

/s/ David Glanzberg

DAVID S. GLANZBERG, ESQ

CJA Appointed Counsel

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CERTIFICATE OF CONCURRENCE

I, David S. Glanzberg, CJA appointed counsel, certify that I communicated with Michelle Olshefski, Assistant United States Attorney, and counsel advised that she concurs in the within motion.

Date: December 21, 2023

/s/ DAVID GLANZBERG
DAVID S. GLANZBERG, ESQ
CJA Appointed Counsel

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AND NOW, this _____ day of _____, 2023, upon consideration of Defendant's Motion to Continue and the Government's concurrence therewith, the Court finds that the ends of justice will be served by affording such an extension. The Court further finds that an extension outweighs the best interests of the public and the Defendant in a speedy trial, and that any delay occasioned by this continuance shall be excluded from speedy trial calculations pursuant to U.S.C. §3161(h)(7).

Accordingly, it is hereby Ordered that Defendant's Motion is GRANTED.

Defendant shall file pretrial motions no later than _____, 20____. Jury Selection and Trial will be scheduled after the expiration of the motion deadline, or, if one or more pretrial motions are filed, or a motion seeking a further extension of time to file pretrial motions is granted, after the resolution of any such pretrial motion that may be filed.

United States District Judge